| 1                                     | NICHOLAS A. TRUTANICH   |  |  |
|---------------------------------------|---|--|--|
| 2                                     | United States Attorney<br>Nevada Bar Number 13644                                       |  |  |
| _                                     | JARED L. GRIMMER  |  |  |
| 3                                     | Assistant United States Attorney  |  |  |
| 4                                     | 501 Las Vegas Boulevard South, Suite 1100<br>Las Vegas, Nevada 89101                    |  |  |
| 1                                     | Telephone: 702-388-6336   |  |  |
| 5                                     | jared.grimmer@usdoj.gov  Attorneys for the United States                                |  |  |
| 6                                     | Attorneys for the Ontieu States   |  |  |
| 7                                     | UNITED STATES DISTRICT COURT  |  |  |
| , , , , , , , , , , , , , , , , , , , | DISTRICT OF NEVADA  |  |  |
| 8                                     | UNITED STATES OF AMERICA,   | Case No. 2:20-mj-00281-VCF   |  |
| 9                                     | Plaintiff,  | Stipulation for an Order Directing Probation to Prepare a Criminal |  |
| 10                                    | V.  | History Report   |  |
| 11                                    | VENANCIO JUAREZ-CESAR,  |  |  |
| 12                                    | aka VENANCIO JUAREZ-SANTIAGO, aka VENANCIO SANTIAGO,                                    |  |  |
|                                       | aka VENANCIO JUAREZ,  |  |  |
| 13                                    | aka CESAR JUAREZ,<br>aka DELPHINO JUAREZ RAMIREZ,                                       |  |  |
| 14                                    | aka BEBI III (O JOI KIBE KI MIKEE),   |  |  |
| 15                                    | Defendant.  |  |  |
| 13                                    |   |  |  |
| 16                                    | IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.                          |  |  |
| 17                                    | Trutanich, United States Attorney, and Jared L. Grimmer, Assistant United States        |  |  |
| 18                                    | Attorney, counsel for the United States of America, and Wendi Overmyer, Assistant       |  |  |
| 19                                    | Federal Public Defender, counsel for Defendant Venancio Juarez-Cesar, that the Court    |  |  |
| 20                                    | direct the U.S. Probation Office to prepare a report detailing the defendant's criminal |  |  |
| 21                                    | history.  |  |  |
| 22                                    | This stipulation is entered into for the following reasons:                             |  |  |
| 23                                    |   |  |  |
| 24                                    |   |  |  |

| 1  | 1.   | 1. The defendant has elected to review the government's Fast Track offer to  |   |
|----|--|--|---|
| 2  | resolve this matter. If he accepts this offer, the parties will jointly request an expedited |  |   |
| 3  | sentencing date 45 days from the change of plea.   |  |   |
| 4  | 2.   | The U.S. Probation Office cannot begin obtaining the defendant's criminal  |   |
| 5  | history until  | ry until after the defendant enters his guilty plea unless the Court enters an order   |   |
| 6  | directing the U.S. Probation Office to do so. Such an order is often entered in the minutes  |  |   |
| 7  | of a defendant's initial appearance.   |  |   |
| 8  | 3. The U.S. Probation Office informs the government that it would like to begin              |  |   |
| 9  | obtaining the defendant's criminal history now so that it can complete the Presentence       |  |   |
| 10 | Investigation Report by the time of the expected expedited sentencing.                       |  |   |
| 11 | Accordingly, the parties request that the Court enter an order directing the U.S.            |  |   |
| 12 | Probation Office to prepare a report detailing the defendant's criminal history.             |  |   |
| 13 | DATED this 20th day of April, 2020.  |  |   |
| 14 |  |  | Respectfully submitted,                         |
| 15 |  |  | NICHOLAS A. TRUTANICH<br>United States Attorney |
| 16 |  | //s//  |   |
| 17 | WENDI OVERMYER Assistant Federal Public Defender Counsel for Defendant VENANCIO JUAREZ-CESAR | JARED L. GRIMMER Assistant United States Attorney  |   |
| 18 |  | , and the second |   |
| 19 |  |  |   |
| 20 |  |  |   |
| 21 |  |  |   |
| 22 |  |  |   |
| 23 |  |  |   |
| 24 |  |  |   |

## UNITED STATES DISTRICT COURT **DISTRICT OF NEVADA**

1 2 3 UNITED STATES OF AMERICA, Case No. 2:20-mj-281-VCF 4 Plaintiff, **Order Directing Probation to** Prepare a Criminal History Report 5 v. VENANCIO JUAREZ-CESAR, 6 aka VENANCIO JUAREZ-SANTIAGO, 7 aka VENANCIO SANTIAGO, aka VENANCIO JUAREZ, 8 aka CESAR JUAREZ, aka DELPHINO JUAREZ RAMIREZ, 9 Defendant. 10 11 Based on the stipulation of counsel, good cause appearing, and the best interest of 12 justice being served: 13 14 15

IT IS HEREBY ORDERED that the U.S. Probation Office is directed to prepare a report detailing the defendant's criminal history.

DATED this 22nd day of April, 2020.

16

17

18

19

20

21

22

23

24

HONORABLE CAM FERENBACH UNITED STATES MAGISTRATE JUDGE

an Backer